

NATIONAL CERTIFICATION PROGRAM
FOR
OIL AND GAS INSPECTION AND ENFORCEMENT PERSONNEL

U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

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Table of Contents

I. GENERAL

A.	The National Certification Program	3
B.	Purpose of the Certification Program	3
C.	Who must Be Certified	3
D.	Limited Certification	4
E.	Utilization of Non-certified Personnel	4
F.	Responsibilities For Program Management	4
G.	Certification of State and Indian Cooperators	5

II. THE CERTIFICATION PROGRAM

A.	Certification Process	5
B.	Model Certification Program	5
C.	Technical Review Process	6
D.	Crediting Prior Experience and Education Toward Certification	7
E.	Completion of Certification Requirements Where OJT is Not Available At the Duty Station	7
F.	Identification Cards	7

III. TRAINING PROGRAMS

A.	On-the-Job-Training Programs	7
B.	Crediting Prior In-House Formal Training	8

IV. MISCELLANEOUS

A.	Phase-in Period	8
B.	Position Descriptions	8
C.	Transfer of Certification Between State Offices	8

APPENDIX 1.	The Certification Training Program and Tracking System	1-12
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APPENDIX 2.	Certification Criteria and Record of Review	1-5
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I. GENERAL PROVISIONS

A. The National Certification Program

The National Certification Program for Oil and Gas Inspection and Enforcement Personnel (NCP) is a systematic training and professional development process whereby the Bureau of Land Management (BLM):

- provides personnel with the skill and knowledge, necessary to conduct and document regulatory inspections of oil and gas drilling and/or production operations, and
- formally recognizes the attainment of such skill and knowledge through the issuance of Form 3100-8, Federal Oil and Gas Inspector ID Card.

B. Purpose of the Certification Program

The BLM has established the Certification Program to facilitate a consistent level of expertise among oil and gas inspection personnel nationwide. The establishment of a common level of expertise is desirable for a number of reasons, including the following:

- The inspection and enforcement program regulates a major revenue-producing program of the U.S. Government.
- Inspection and enforcement personnel have significant responsibilities in the areas of public health and safety, protection of the surface and subsurface environment, production accountability, and Indian trust responsibilities.
- Inspection and enforcement personnel are a first point of contact for the BLM with the public.
- Inspection and enforcement personnel are responsible for identifying instances of regulatory noncompliance, occurrences which may result in monetary penalties and litigation.
- Inspection and enforcement personnel may be called upon to serve as expert witnesses in hearings and legal proceedings, in which case professional qualifications must be established.

C. Who Must Be Certified

The purpose of this program is to ensure that inspection and enforcement program activities are performed only by persons properly trained in the technical and regulatory aspects of oil and gas drilling and production. Personnel who are involved in the technical aspects of the program will be certified. This includes, but is not limited to, Petroleum Engineering Technicians (PET) and other personnel who:

- Inspect oil and gas operations for compliance with operating regulations, regardless of the classification or title of their position. Utilization of other personnel to conduct NEPA assessments and/or surface compliance inspections does not require certification.
- Execute, issue, or contribute to the completion of citations for noncompliance with governing regulations, i.e., Form 3160-9, Notice of Incidents of Noncompliance (INC), concerning the technical aspects of oil and gas drilling and production equipment and operations.
- Review and/or advise management or operators on the technical aspects of appeals from citations (INC's), penalties, and assessments, including State Director and other technical reviews.
- Provide technical supervision of inspection personnel.
- Coordinate inspection and enforcement program activities.

Certification of personnel exercising administrative oversight over inspection and enforcement program responsibilities is desirable but not mandatory.

D. Limited Certification

On a case by case basis, limited certification may be approved for those positions conducting PET inspection responsibilities. This may include, but not limited to, positions such as Petroleum Engineers and Petroleum Accountability Technicians. These positions must receive OJT on inspection procedures and requirements and complete the certification criteria for the specific activity being performed.

E. Utilization of Non-certified Personnel

This would include personnel performing NEPA assessments and compliance inspection responsibilities. Non NEPA problems or issues observed during these inspections should be referred to certified inspection personnel.

For persons in the On-the-Job-Training phase of the Certification Training Program, participation in field inspections provides a valuable "hands-on" training opportunity. It is expected that, as a practical matter, managers may wish to utilize trainees with some applicable experience to deal with inspection issues with which they are already certifiable. In such cases, all work will be reviewed by certified inspection personnel before any official action is taken. Additionally, non-qualified personnel may not perform PET inspection activities without supervision of certified inspection personnel.

F. Who May Issue Incidents of Non-Compliance (INC) Form 3160-9

The use of the INC form is not limited to certified personnel. Only those personnel who have successfully completed the NTC I&E Compliance training module (not the certification training program) will be allowed to issue INCs using form 3160-9. Use of the INC form, in lieu of the Notice of Violation Letter, is optional to obtain compliance for non-technical aspects of the I&E program.

G. Responsibilities For Program Management

- Director. The Director of the Bureau of Land Management is responsible for establishing program policy and standards, coordinating the nationwide implementation, and evaluating the effectiveness of the National Certification Program.
- State Director. The State Director is responsible for developing and implementing a State-level certification program, including a formal on-the-job training program, in accordance with national program standards and goals.
- The Authorized Officer. The National I&E Program Lead (WO-310), is administratively responsible for declaring an employee "certified" and for issuing Form 3100-8, Federal Oil and Gas Inspector ID Card.
- Technical Reviewer. The Technical Reviewer is responsible for training and/or examining personnel in those competencies contained in the Certification Criteria and Record of Review (Certification Criteria), appendices No. .3 which are required for certification.
- Certified Instructor. A certified instructor in the context of the program, is an official who has been certified under this program and who is appointed to instruct a candidate for certification in any or all elements of the Certification Training Program.

H. Certification of State and Indian Cooperators

Qualifications requirements for State and Indian tribal personnel participating in inspection and enforcement program activities under cooperative agreements, delegations, or memoranda of understanding, may be determined by State Directors.

II. THE CERTIFICATION PROGRAM

A. The Certification Process

An employee may be formally declared certified only after successfully completing a specified regimen of internal training. The purpose of the training is to ensure that inspection and enforcement personnel possess a working knowledge of the laws and regulations governing oil and gas drilling and production operations on onshore Federal lands, as well as related operational standards and recommended practices in common use by industry, on-site inspection tasks and procedures, documentation systems, remedies and penalties for noncompliance, and appellate procedures. Specifically, the following is required:

1. Formal Training. Completion of National Training Center (NTC) Course 3000-17, Fluids Inspection and Enforcement: Drilling, Course 3000-18, Fluids Inspection and Enforcement: Production, and Course 3000-89, Applied AFMSS for Inspectors (or subsequent specified curriculum), and the required refresher course(s).
2. On-the-Job Training. Completion of a comprehensive on-the-job (OJT) training program developed and conducted by the employee's State Office organization in accordance with national standards. The full range of skill and knowledge deemed necessary for certification are consolidated into Appendix 1, Certification Training Program, and these elements should be used as the basis for State-level OJT programs. While most are addressed in Courses 3000-17 and 3000-18, some skill and knowledge require further study, practice and/or field application in order to develop full proficiency. In some instance OJT may be necessary for refresher purposes.
3. Technical Review. The successful demonstration of field inspection tasks and applied knowledge before a designated Technical Reviewer. Attachment 2, Certification Criteria, represent tasks that are routinely performed by inspection personnel during the conduct of field inspections. To be certified, inspection personnel must demonstrate proficiency in each task.
4. Certification. The issuance of Form 3100-8, Federal Oil and Gas Inspector ID Card, by an Authorized officer designated by the State Director.
5. Certification Maintenance. Certified inspection personnel must complete the NTC drilling and production refresher course every five years. Proficiency in basic competency is required to maintain certification. Remedial training is required to address any deficiencies identified in the certification maintenance training.

B. Model Certification Program

Ideally, the certification program would follow the following chronology of events in the case of a new hire:

- Phase I, Orientation.
After entry on duty, and prior to attending formal training, the trainee will be introduced to and familiarized with, the duties and responsibilities of the job through a orientation program established by the State Office organization and administered at the duty station. Typically, this orientation will consist of reviewing internal policies and procedures as contained in governing regulations, manual issuances, and other references, and observing field inspections. As a part of this phase, it is recommended that the trainee complete the self-study programs administered by the National Training Center, Courses 3000-ST-1, Familiarization With Oil and Gas: Overview, 3000-ST-2, Familiarization With Oil and Gas: Drilling Equipment and Operations, and/or 3000-ST-3, Familiarization With Oil and Gas: Production Operations.
- Phase II, Formal Training.
All trainees must complete the following formal training courses sponsored by the National Training Center:
 - Course 3000-17, Fluids Inspection and Enforcement: Drilling.
 - Course 3000-18, Fluids Inspection and Enforcement: Production.
 - Course 3000-89, Applied AFMSS for Inspectors.

- Phase III, On-the-Job Training

Trainee will receive ongoing training in inspection procedures and day-to-day operations through a program of on-the-job training established by the State Office organization and administered at the duty station. Supervisors of candidates for certification are responsible for arranging for a certified instructor to work with the trainee during the OJT training phase. The instructor may be different for various parts of the program and must date and initial the progress tracking chart as each element is completed. Instruction should place particular emphasis on those skills and knowledges specifically identified in Attachment 2, Certification Criteria.

- Phase IV, Technical Review

Following completion of Phases I, II, and III, or in the course of completing Phase III, the trainee demonstrates proficiency in the Certification Criteria before a Technical Reviewer.

Since the emphasis of the National Certification Program is on the timely and systematic acquisition of skills, the model chronology described above, which stresses orientation, formal training, and OJT training, may be modified to accommodate individual situations involving experienced personnel already on the rolls or new hires with substantial field experience. For example, current employees who have completed formal training requirements and do not require orientation may move immediately to any part of the OJT phase or even directly to the demonstration of skills phase. New hires may move from orientation to OJT if attendance at formal training cannot be scheduled timely. Likewise, the demonstration of individual certification criteria skills may take place over a period of time as instruction takes place and/or-other circumstances dictate. It is not intended specifically that this phase be completed at one time in the manner of a "final examination."

C. Technical Review Process

Skill and knowledge required for the inspection of oil and gas drilling and production operations encompass 1) the technical processes used by operators, and 2) the specific regulatory requirements and procedures imposed by the U.S. Department of the Interior.

Such demonstrations of skill will encompass all elements of the Certification Criteria (app.2), each element of which must be demonstrated to the satisfaction of the Technical Reviewer. Demonstrations of individual elements may be clustered in like groups, or they may be conducted individually, as determined between the trainee and the reviewer. Demonstrations are to be conducted in such a manner as to clearly demonstrate proficiency in the skill. Use of gauging equipment should involve the actual measurement of a tank on a producing facility. The simulation of skills or procedures is not acceptable for purposes of this requirement.

The designated Technical Reviewer shall be responsible for completion of the (app.2) checklist portion of the Certification Criteria by dating and initialing each criteria when the trainee has completed that element to the Technical Reviewer's satisfaction.

Should the designated Technical Reviewer not be the certified inspection personnel who worked with the trainee on any OJT element which is certification criteria, it shall remain the Technical Reviewer's responsibility to assure that the trainee meets the Certification Criteria.

When all Certification Criteria have been met, the Technical Reviewer will forward the checklist to the Authorized Officer.

The Authorized Officer shall have the discretion to further review the trainee's qualifications and either 1) certify the trainee and issue Form 3100-8, Federal Oil and Gas Inspector ID Card, or 2) require further training.

The completed Certification Criteria and Record of Review checklist including the Certification Certificate will be filed in the employee's official personnel folder.

D. Crediting of Education and Experience Toward Certification

It is recognized that many of the skills and knowledge required for certification may be attained through experience with industry, prior service with Federal or state organizations regulating oil and gas operations, or technical schools providing training in the petroleum field. However, the BLM has no effective means of crediting the wide range of possible education or work experiences against the individual criteria established for certification. Therefore, in order to be certified, a candidate must demonstrate specified knowledge, skill, and ability before a designated Technical Reviewer.

E. Completion of Certification Requirements Where Required Experience is Not Available At the Duty Station

Certification covers both drilling and production operations, and the unavailability of specific on-the-job training experiences at the duty station does not obviate the requirement for training in, or demonstration of, that particular skill.

As a part of the State OJT program, State Directors should ensure that - should circumstances require - arrangements can be made to provide employees with needed experience, and technical review covering that experience, at another inspection office within the State or in another State Office organization.

F. Identification Cards

The BLM will continue to utilize the current Form 3100-8, Federal Oil and Gas Inspector ID Card, as a unique means of identification for oil and gas inspection personnel. It is the intent of this policy that all identification cards issued in the future will reflect certification under this program. Under no circumstances will identification cards be issued to personnel who are not certified.

- New Employees. New employees will not be issued identification cards until they are certified.
- Current Employees. Personnel now on the rolls will be issued new cards upon successful completion of the NTC refresher class(es).

III. TRAINING PROGRAMS

A. State-level OJT Training Programs

Orientation and on-the-job training will be conducted under programs developed by the State Director.

The supervisor of each trainee is responsible for arranging for an appropriate certified personnel to work with and review each element of the program as the trainee's progresses. The reviewer, who may be different for each element, is responsible for dating and initialing the Certification Training Program Tracking System checklist as each element is completed.

On-the-Job training requirements which cannot be met within the home office due to lack of opportunity, i.e., drilling operations not currently being conducted, will be met by detailing the employee to another field location where that opportunity does exist.

At the State Director's option, trainees may be required to actually complete only those sections of an OJT training program that deal with the areas for which the employee is 1) not already certifiable, or 2) for which deficiencies were identified during the review process.

B. Crediting Prior In-House Formal Training

All sessions of Fluids Inspection and Enforcement: Drilling, Course No. 3000-17, and Fluids Inspection and Enforcement: Production, Course No. 3000-18, taught during Fiscal Year 1986 are fully creditable toward the formal training requirement for certification. Future sessions of Course 3000-17 and 3000-18 will be creditable.

No other formal training courses, internal or external, are creditable toward certification.

IV. MISCELLANEOUS

A. **Phase-in Period**

New inspection personnel must complete the certification program within three year.

Currently certified employees must satisfactorily complete the refresher training within two years of implementation of this IM. When deficiencies are identified, an additional one year will be provided for remedial training and demonstration of competency per section II.A.3.

B. **Position Descriptions**

The certification criteria represent a composite of common base-level knowledge and proficiency which are typical of all types of drilling, production, and other related inspections. These knowledge and proficiencies vary widely in application based on the nature, complexity, and phase of operations for each individual operational site. Therefore, these certification criteria can not and should not be interpreted to constitute duties representative of any particular grade, nor should they be used as the basis for position descriptions.

C. **Transfer Between State Offices Following Certification**

Since the National Certification Program is based on nationwide criteria, skills and knowledge are readily transferable from one state office to another. Therefore, certified employees who move to a different State Office organization need not be re-certified.